

# Privacy statement

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Your privacy is important to us and to Société Générale Group to which Ayvens belongs. This is a matter of priority for us and we have implemented strong principles in that respect, especially in regards of the EU General Data Protection Regulation. Ayvens Sweden AB (hereafter “**Ayvens**”) value the trust of customers, suppliers and business partners and are committed to protecting their personal data. Compliant privacy and information security practices are therefore integral components of Ayvens’ services, corporate governance, risk management and overall accountability. We only process such personal data as is necessary for our business activities and the provision of the Ayvens services.

This Global Privacy Statement (the “**Statement**”) describes our practices in connection with the personal information (“**Personal Data**”) that we process about you and your business relationship with Ayvens.

Please read this Global Privacy Statement carefully so that you understand how we collect and use your Personal Data.

[Click here to download this Statement.](#)

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## 1. Scope of this statement

1. Website visitors/users (“**Website Visitors**”);
2. Corporate Customers (“**Customers**”);
3. Customers’ employees/drivers (“**Drivers**”);
4. Private lease customer (including sole proprietors and partnerships) (“**Private Lease Customers**”);
5. Private buyers of used vehicles (“**Buyers**”);
6. Professional buyers of used vehicles (“**Traders**”);
7. Suppliers of goods and services (“**Suppliers**”); and
8. Any third party, other than a customer, buyer, trader or supplier, with a business relationship or strategic alliance (“**Business Partners**”).

or prospects in relation to the above; individually and collectively also referred to as “**you**”, “**your**” or “**yours**”.

We collect and use your Personal Data through our various vehicle and fleet leasing, fleet management and driver mobility services and in the course of performing our business activities (“**Services**”).

Please also note that specific services may be subject to a separate privacy statement.

### **Responsibilities of customers**

Insofar as Customers in their capacity as employers have access to Personal Data of their employees, i.e. Drivers, the Customer is the controller responsible for the processing and use thereof in such capacity. This Statement does not apply to the processing and use of Personal Data of Drivers by Customers.

## 2. Who are we?

Ayvens Sweden AB, Råsundavägen 4, 169 67 Solna (“Ayvens”) is responsible (data controller) for the company’s processing of Personal Data.

Ayvens may also be referred to as “**we**”, “**our**” or “**us**”.

## 3. How do we collect your personal data?

We and our service providers collect Personal Data in the following ways:

- **Through sales activities**

We commence the processing of Personal Data if you provide this, directly or indirectly via third parties, e.g. as part of an offline sales lead, registration, online contact form, inquiry by e-mail, telephone, chat and/or application, survey or price competition.

- **Through the Services**

Most of the Personal Data we collect are in relation to the Services we provide or will be providing to you as (i) a Driver and our Customer, your employer, if you are using a company vehicle, or (ii) a Private Lease Customer. This starts with the registration of your Personal Data with respect to the vehicle to be leased (in some circumstances we may do some preliminary credit checks before this) and continues with the registration of the leased vehicle and when we communicate with you about our services, e.g., to arrange for periodic maintenance and repairs. We may also process your Personal Data when your vehicle inadvertently is involved in an accident, to ensure mobility and restoration of damages, or where we are the recipient of traffic fines in relation to your leased vehicle. Next to our core-leasing activities, we also provide a number of other related services, such as e-mobility services, fuel card services, charging services, car rental services, and roadside assistance. Another service we provide relates to car remarketing, sales of used Ayvens vehicles.

- **Online**

We collect Personal Data from you online, when:

- You visit our websites or social media channels; or
- Place an order over the phone or contact customer service.

- **From other sources**

We receive your Personal Data from other sources, for example:

- Drivers' employers, if you use a company vehicle;
- The relevant authority (e.g., police or justice department) where we are the recipient of traffic fines or administrative charges in relation to your leased vehicle;
- Public and government authorities, including public and government authorities outside your country of residence, where we are subject to sanctions and embargoes or anti-money laundering and counter terrorism regulations;
- From our independent service partners who assist us in providing our leasing and other services to you, including dealerships, maintenance providers and body repair shops;
- From our partnerships being for instance original equipment manufacturers or dealerships;
- Publicly available databases, credit reference agencies and other sources.

We need to collect Personal Data in order to provide the requested Services to you or to handle queries, comments or complaints related to our Services. If you do not provide the Personal Data requested, we may not be able to provide the Services. If you disclose any Personal Data relating to other persons to us or to our service providers in connection with the Services, you represent that you have the authority to do so and to permit us to use the information in accordance with this Statement.

### **Monitoring of communications**

Subject to applicable laws, we will monitor and record calls, e-mail, text messages and other communications we have with you. We do this for compliance with regulatory rules, self-regulatory practices or procedures relevant to our business, to prevent or detect crime, in the interests of protecting the security of our communication systems and procedures, and for quality control and staff training purposes.

For example, where we are required by a regulator to record certain telephone lines (as relevant) we will do so. In addition, where appropriate and having regard to applicable data protection law, our monitoring will be to check for inappropriate content in communications. In very limited and specific circumstances we may conduct short term carefully controlled monitoring of your activities where this is necessary for our legitimate interests or to comply with a legal obligation. We may do this for instance where we have reason to believe that fraud or other crime is being committed, where offences are suspected and where the monitoring is proportionate to the type of the disciplinary offence, or where we suspect non-compliance with sanctions and embargoes or anti-money laundering and counter terrorism regulations to which we are subject. In particular, telephone calls may be recorded for these purposes.

## **4. Why and on which legal basis do we use personal data?**

Ayvens and several of its suppliers, in their capacity as controller or processor, carry out a number of processing operations of personal data necessary for the conclusion and performance of leasing contracts and related services and for the proper conduct of their respective activities. In this respect, Ayvens has listed below the purposes for which Ayvens carries out processing within the framework of its business relations with leasing customers and employees of customers (drivers and contact persons of customers), car buyers and others who are in contact with Ayvens for various reasons (see also section 1 ‘Scope of this statement’).

### **4.1 Data pertaining to website visitors**

#### **4.1.1 Websites**

##### **4.1.1.a To communicate with you**

*What does this purpose entail?*

We process your Personal Data when you contact us via one of our online contact forms, for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services. This processing is done for the entering into or performance of an agreement that you have with us, to be able to respond to a request or with your consent.

*Which Personal Data do we process for this purpose?*

For this purpose, we may collect your (business) contact details (for instance your name(s), e-mail address, telephone number), license plate number and any other information that you provide to us in the open text fields of the contact form, where you can, for example, pose your question, describe your suggestion, make a compliment or share a complaint.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.1.1.b For surveys or other (marketing) communication**

*What does this purpose entail?*

We process your Personal Data when you complete a survey on our website or via another tool, for feedback about our websites and/or Services, with your consent or for which we have a legitimate interest to process these data (improvement of services). With your consent or where we have a legitimate interest, we may send you marketing communication, to keep you updated on events, special offers, possibilities and current and future products and services of Ayvens. When we contact you in regard of surveys or marketing communication, we will do so either by e-mail, phone, or by post. If you would no longer like to receive surveys or marketing communication from us, please use the opt out options in the communication or contact using the contact detailed in section 12. 'How can you contact us?'. Based on your visit to a website of Ayvens, we can show you personalized advertisements outside the Ayvens website. To understand what is relevant to you, we can use manual and automated tools to analyse your personal information.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, your address, your e-mail address and topics you may be interested in (as may be indicated by you on our website).

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.1.2 Social media**

##### **4.1.2. a To facilitate social sharing functionality**

*What does this purpose entail?*

Our websites may contain various social media sharing functionalities, such as LinkedIn, Instagram or YouTube buttons, which, with your consent, you may use to share information provided on our websites with the social media of your choosing. Our websites may also contain links to our own social media pages, such as our LinkedIn page, which you may choose to use to post feedback.

Likewise, various social media websites, such as LinkedIn, Facebook, Snapchat, or X, may contain Ayvens advertisements containing links to our websites. These social media websites

may, with your consent, share information provided by you with us when you choose to follow a link to one of our websites.

Please note that we are not responsible for the collection, usage and disclosure policies and practices (including the data security practices) of other organizations, such as Meta (Facebook), X, Apple, Google, Microsoft, RIM or any other app developer, app provider, social media platform provider, operating system provider, wireless service provider or device manufacturer, including any personal information you disclose to other organizations through or in connection with our social media functionalities and/or advertisements. Processing of personal information is subject to privacy policies and practices of these other organizations.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, e-mail address, IP-address, photo, list of social media contacts and any other information that may be accessible by us when using social media functionalities.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.1.3 Cookies and similar technologies**

Ayvens may collect information via cookies to provide you with a better experience. Cookies are used, together with other tracking tools, to save your preferences and parameters, which saves time (for example, the language you have chosen), enable login, fight fraud, analyse the performance of our website and services and to compile visitor statistics. Any processing of your personal data via cookies and/or similar technologies will be done in accordance with our Cookie Policy, which is available at <https://www.ayvens.com/en-se/cookie-policy/>.

#### **4.1.4 Ayvens business purposes**

##### **4.1.4.a Management reporting**

*What does this purpose entail?*

Personal Data for various Ayvens business-related purposes for which we have a legitimate interest to process these data, such as audits, developing new products, enhancing, improving or modifying our websites and Services, data analysis, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or

device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your e-mail address, place of residence, digits of your postal code and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.1.4.b Compliance with laws and legal obligations and protection of Ayvens assets and interests**

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations;
- (b) to comply with legal process;
- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions and other applicable policies;
- (e) to protect our operations;
- (f) to protect our and/or our affiliates', your or other's rights, privacy, safety or property; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, your contact information, your correspondence with Ayvens, your use of any of our Services and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

*With whom do we share your Personal Data?*

If we are required to do so by law or sectorial recommendation to which Ayvens is subject, or if we have a legitimate interest to that effect, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See also section 5 '[Who has access to your data?](#)'.

## **4.2 Data pertaining to customers**

### **4.2.1 Customer account management**



#### **4.2.1.a To provide, manage and administer the Customer account**

*What does this purpose entail?*

We process your Personal Data to handle day-to-day management and administration of the Customer accounts, such as maintaining contracts and keeping you informed of important developments concerning the Services and other information which is relevant for the Customer contract and account. This processing is based on the performance of the lease agreement that we have with you or based on a legal obligation.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process business contact details and log-in details to our Customer online accounts.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.2.1.b To communicate with you**

*What does this purpose entail?*

You can contact us by various means (such as e-mail or telephone, or via our website). In this case we will use your Personal Data to answer your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Customer account. This processing is based on our legitimate business interest and relates to the performance of the lease agreement that we have with you, or with your consent.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your contact details, your correspondence with Ayvens pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.2.1.c For surveys or other (marketing) communication**

*What does this purpose entail?*

We process your Personal Data to send you surveys, for which we have a legitimate interest to process these data (improving or modifying our Services). With your consent or where we have a legitimate interest, we may send you marketing communication, for example, to keep you updated on events, current and future offers, possibilities and current and future products and services of Ayvens. We will send you such surveys in the form of either a periodic e-mail or an e-mail to request your feedback on our Services and other services performed on the vehicle. We

may also send you postal mailings (newsletters/brochures/magazines). To understand what is relevant to you, we can use manual and automatic tools to analyse your personal information. If you would no longer like to receive surveys or marketing communication from us, please opt out or contact us via the local Ayvens entity website form or via the contact details set out below.

To facilitate your use of our online Services or applications, we may analyse data that we collect when using our digital media, and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name and your business contact details.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.2.2 Ayvens premises**

##### **4.2.2.a Access to and security control of Ayvens premises**

*What does this purpose entail?*

We may process your Personal Data when you visit us on our premises for the purpose of ensuring appropriate access controls and security, for which we have a legitimate interest (safety and security of our assets).

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your contact information and the person you are visiting. We may also process video and/or audio information about you through video/audio recording equipment, such as for instance CCTV.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.2.3 Customer reporting**

##### **4.2.3.a Fleet reporting tool**

*What does this purpose entail?*

We provide MyAyvens, a designated fleet reporting tool. Customers’ contact persons can log onto these tools to review the fleet and perform contract administration. This processing is done based on our legitimate interest (to be able to service Drivers being employees of our Customers) and relates to the performance of the lease agreement that we have with our Customer.

*Which Personal Data do we process for this purpose?*

For this purpose, we process contact details and job function (e.g., (International) Fleet Manager) of Customer's contact person, and login details (e.g., username and password).

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.2.4 Ayvens business purposes**

##### **4.2.4.a Management reporting**

*What does this purpose entail?*

We process your Personal Data for various business purposes, for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process various information that we collect in the context of providing our Services (such as your name, contact details, fleet details etc.), as needed for one of the purposes set out above.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

##### **4.2.4.b Compliance with laws and legal obligations and protection of Ayvens assets and interests**

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) under applicable law and regulations (concerning e.g. know your customer/KYC, money laundering, financing of terrorism and other crimes);
- (b) credit checks;
- (c) to comply with legal process;

- (d) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (e) to enforce our terms and conditions and other applicable policies;
- (f) to protect our operations;
- (h) to protect our and/or our affiliates', your or other's rights, privacy, safety or property; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

*Which Personal Data do we process for this purpose?*

For this purpose, we process the name, contact information, the date, place and country of birth of the ultimate beneficial owner of the counterparty that Ayvens want to do business with; we may also process the name, address and the date, place and country of birth of the person(s) who represent the company towards Ayvens; your correspondence with Ayvens, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For know your customer (KYC) purposes we periodically also process investigation data based on sanctions, adverse media, politically exposed persons and anti-slavery screening. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note, multiple (trained) employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

*With whom do we share your Personal Data?*

Only if we are required to do so by law or sectorial recommendation to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See section 5 '[Who has access to your data?](#)'.

### 4.3 Data pertaining to drivers (employees of our customers)

#### 4.3.1 Driver contact

##### 4.3.1.a To communicate with you

*What does this purpose entail?*

You can contact us by various means (such as e-mail or telephone, or via our website). In this case we will use your Personal Data to answer your question/request. We can also contact you in relation to your vehicle or other relevant driver-related issues. In relation to you this processing is based on our legitimate interest and is part of delivering the Services to you and/or your employer (under the lease agreement that we have with your employer) or with your consent.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, your contact information, your correspondence with Ayvens pertaining to your question/request and all other Personal Data you provide to us and/or which is necessary to appropriately respond to you, including your license plate number. For quality and training purposes we may also record your telephone calls with customer services departments for which we have a legitimate business interest.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.3.1.b For surveys or other (marketing) communication**

*What does this purpose entail?*

We process your Personal Data when we send you periodic surveys to request your feedback on our Services and other services performed on the vehicle, for which we have a legitimate interest to process these data. With your consent or where we have a legitimate interest, we may send you marketing communication, to keep you updated on events, current and future offers, possibilities and current and future products and services of Ayvens. When we contact you in regard of surveys or marketing communication, we will do so either by e-mail or by postal mailings (newsletters/brochures/magazines). To understand what is relevant to you, we can use manual and automatic tools to analyse your personal information. If you would no longer like to receive marketing communication from us, please contact us via the contact form or marketing communication from us.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, your address, your e-mail address, your license plate number and your interests (as indicated by you).

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.3.2 Vehicle services**

##### **4.3.2.a Management of the vehicle**

*What does this purpose entail?*

We process your Personal Data in relation to administering your use of the vehicle and to handle the day-to-day management of the vehicle, for which we have a legitimate interest, and this is also related to delivering the Services to you and your employer under the lease agreement that we have with your employer.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, address, (company) e-mail address, lease category, license plate number, make and model, service history and operational contact with you. In addition, you may provide certain information pertaining to vehicle management to us through the Ayvens or third-party portals or apps, or when you call Ayvens.

*With whom do we share your Personal Data?*

We share information pertaining to the management of the vehicle with our Customers (your employer). See section 5 '[Who has access to your data?](#)'.

#### **4.3.2.b Repair, maintenance and tires**

*What does this purpose entail?*

We process your Personal Data in relation to providing (scheduled) repair and maintenance and tire services and to analyse, predict and pro-actively steer on maintenance and repairs for your vehicle, for which we have a legitimate interest, and this is also related to delivering the Services to you and your employer under the performance of the lease agreement that we have with your employer.

*Which Personal Data do we process for this purpose?*

For this purpose, we collect your name, address, e-mail address, license plate number, service history and operational contact with you. In addition, you may provide certain information to us through the Ayvens portal (e.g., your phone number to make an appointment for maintenance of the vehicle), or when you call Ayvens.

*With whom do we share your Personal Data?*

We share information with our Customers (your employer) and with third parties performing maintenance/repair on the vehicle or changing or replacing tires, such as dealers/garages, body repair shops or car fitters. See section 5 '[Who has access to your data?](#)'.

#### **4.3.2.c Accident management**

*What does this purpose entail?*

We process your Personal Data by recording and administering accidents that your vehicle may have been involved in. We will do so by giving you an opportunity to report accidents via our customer services department or via MyAyvens, and, when applicable, providing roadside assistance and/or a replacement vehicle. This processing is based on our legitimate interest, and this is also related to delivering the Services to you and your employer under the performance of the lease agreement that we have with your employer. We may also use this information for assessing damage repairs under our damage handling and risk retention policies, for which we have a legitimate interest to process these data.

*Which Personal Data do we process for this purpose?*

For this purpose, we collect the following Personal Data:

- Us: license plate number, service history and operational contact with you.
- From you: your name, contact details, vehicle details, accident details, damage details, photos of the incident, date of birth, number of passengers in the vehicle, information of witnesses to the accident (if applicable) and any other information you choose to provide to us in the context of the accident (including any information pertaining to possible injuries).
- From third parties, such as individuals involved in the accident or insurance companies: information of third parties involved in the accident/incident (such as the identity of your passengers, driver and passengers of third-party vehicles, and other third parties involved), information of other third parties (such as witnesses, investigating police officers and others) insurance information, information about the incident and third-party claims.

- From authorities (such as police): your name, address, license plate number, information regarding the accident, police reports and witness statements.

*With whom do we share your Personal Data?*

We share information related to damage on the vehicle with our Customer (your employer). We may also share certain information with dealers/garages, body repair shops, car fitters, insurance companies (which may be both affiliated and third-party insurance companies) and professional experts (such as lawyers, medical experts, investigators, etc.) for the purpose of damage or claim resolution. See section 5 '[Who has access to your data?](#)'.

#### **4.3.2.d Traffic and parking fines management**

*What does this purpose entail?*

The following may depend on the country where Drivers may have committed traffic and/or parking violations. As the registered owner of the vehicles, traffic and/or parking fines incurred by Drivers of the vehicles may be addressed to Ayvens by the authority that issued a specific traffic or parking fine (such as police or local municipality).

We process your Personal Data for the purpose of processing and managing the payment of the fine and, if applicable, obtaining reimbursement from our Customer (your employer), for which we have a legitimate interest to process these data.

*Which Personal Data do we process for this purpose?*

We process information that we receive from the competent authorities (such as police or local municipalities): your name, address and license plate number, the nature, place, date and time of the offense/incident committed by you and the imposed fines.

*With whom do we share your Personal Data?*

Ayvens may need to share this information with our Customer (your employer) in certain situations, for example, when leased vehicles are used in carpools and Ayvens does not know who the actual driver of a specific vehicle is. See section 5 '[Who has access to your data?](#)'.

#### **4.3.2.e Fuel card, EV charging and tolls**

*What does this purpose entail?*

Where applicable, our Services include a fuel management program, which allows you to, for example, pay for your fuel at gas stations using a Ayvens issued or managed payment mechanism. In case you have an electric vehicle (“**EV**”), you may be provided with an EV charging card for charging your vehicle at charge points. We may also arrange for the placement of an EV charge station as part of the contract. This processing is based on our legitimate interest and is also related to delivering the Service to you and your employer under the performance of the lease agreement that we have with your employer).

We may further collect certain information about you to manage toll-related activities of the fleet of vehicles of your employer.

*Which Personal Data do we process for this purpose?*

For this purpose, we collect the following information: your name, contact information, e-mail address, fuel or EV charging card number, charging station number, address, phone number, license plate number, fuel information, mileage and related costs. In case of re-imbursments, we may also need to collect bank account information.

We may also collect toll-related information, such as information on location and time.

*With whom do we share your Personal Data?*

Ayvens needs to share the information with the fuel card/EV charging solution/payment company. Our Customers (your employer) may have access to certain Personal Data made available by us via MyAyvens. Customers can log in and review the status of their fleet (e.g., mileage), and use other fleet reporting functionalities (e.g., fuel consumption and fuel price). See section 5 '[Who has access to your data?](#)'.

#### **4.3.3 Mobility services**

##### **4.3.3.a Renting**

*What does this purpose entail?*

In case we provide rental car to you we collect your Personal Data, so that you can, for example, reach Ayvens' rental specialists through our customer services department, rent a vehicle from the most appropriate rental location or have a rental vehicle delivered to you. This processing is based on our legitimate interest, and this is also related to delivering the Service to you and your employer under the performance of the lease agreement that we have with your employer or, if applicable, the agreement that you have with us.

*Which Personal Data do we process for this purpose?*

For this purpose, we collect: your name, e-mail, phone number, license plate number, related costs and delivery location

*With whom do we share your Personal Data?*

We share your data with Ayvens' (external) rental specialists, as well as with our Customers (your employer). See section 5 '[Who has access to your data?](#)'.

##### **4.3.3.b Roadside assistance**

*What does this purpose entail?*

If you experience damage to the vehicle on the road making it unfit to drive, for example, a flat tire or mechanical difficulties, Ayvens is able to arrange roadside assistance, for which we work



closely with contracted third parties. This processing is based on our legitimate interest and is also related to delivering the Service to you and your employer under the performance of the lease agreement that we have with your employer.

*Which Personal Data do we process for this purpose?*

For this purpose, we collect the following information: your name, e-mail address, mobile phone number, license plate number and location of where assistance was needed and provided.

*With whom do we share your Personal Data?*

We share your information with third parties providing on the road repair services, towing services or a replacement vehicle, as well as with our Customers (your employer). See section 5 [‘Who has access to your data?’](#).

#### **4.3.4 Online portals and apps**

##### **4.3.5.a Various portals and apps for drivers**

*What does this purpose entail?*

We provide online portals and apps through which you can find practical information about your lease vehicle, change your name, contact details and other personal information, report damage to your vehicle, schedule appointments for repairs, maintenance or changing tires through online appointment planners, contact our customer services department, claim (fuel) expenses and manage charging.

We may also provide you with dashboard-type overview that can provide your insight into your use of the vehicle (such as your average fuel efficiency, your damages, etc.). This processing is based on our legitimate interest, and this is also related to delivering the Service to you and your employer under the performance of the lease agreement that we have with your employer) or with your consent.

*Which Personal Data do we process for this purpose?*

We receive your name and e-mail address from your employer (our Customer) to provide you with Ayvens generated log-in data (username and temporary password) so that you can access our various online portals and apps.

*With whom do we share your Personal Data?*

We share your information with third parties engaged by us to administer and execute the various portals and apps for drivers, as well as with our Customers (your employer). See section 5 [‘Who has access to your data?’](#).

##### **4.3.5.b Fleet Reporting Tool**

*What does this purpose entail?*

The designated fleet reporting tool entails dashboard reporting on a country and/or international level to our Customers (your employer). The fleet reporting tool allows Customers for instance to access and evaluate the mileage or the remaining lease period of (individual) vehicles. We also use the data contained in this fleet reporting tool to provide (aggregated) insights to our Customers (your employer) into key aspects of their country's fleet management (such as cost and risk issues) for the purpose of implementing a balanced fleet management approach (cost, environment and safety), managing fleet policy implementation, having the ability to report on global carbon emission as part of the Customer's corporate social responsibility obligations and compliance, assessing the effectiveness of policy changes and proactively communicating relevant fleet developments. This processing is based on our legitimate interest and is also related to delivering the Service to you and your employer under the performance of the lease agreement that we have with your employer).

By way of example, on the basis of such dashboard reporting, each Customer has access to (i) various data pertaining to the CO2 emissions of its vehicle fleet per country, and (ii) measures proposed by Ayvens to reduce the fleet's environmental impact. Ayvens and the Customer can then study and discuss the company's fleet/vehicle policies and set targets in order to achieve a lasting reduction of fuel, CO2 emissions and other vehicle related expenses. Thus, based on such information, each Customer can take informed decisions aimed at reducing CO2 emissions within its fleet in a certain country, e.g., by providing eco-driving style training to its Drivers or acquiring more climate neutral vehicles.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process the following Personal Data.

- From our Customer (your employer): Driver name, customer-generated Driver identification number, name and contact details of Customer's contact person, (e-mail) address, telephone number, nationality, social insurance number (optional: only if required by applicable law or for fiscal purposes) and use of fuel card (optional).
- Ourselves: vehicle details (e.g., make, model, registration number, license plate number), remaining contract duration, damages sustained by a vehicle, fuel type, number and type of fuel card, fuel consumption and insurance data.
- Data received from others (such as police, local municipalities, service garage/centre): traffic and/or parking fines, mileage and information on vehicle maintenance and repairs.

*With whom do we share your Personal Data?*

We share this information with the authorized (International) Fleet Manager on behalf of the Customer (your employer). See section 5 '[Who has access to your data?](#)'.

#### **4.3.5 Ayvens business purposes**

##### **4.3.6.a Management reporting**

*What does this purpose entail?*

We process your Personal Data for various business purposes, for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process various information that we collect in the context of providing our Services (such as your name, contact details, vehicle details etc.), as needed for one of the purposes set out above.

*With whom do we share your Personal Data?*

We share this information with the authorized (International) Fleet Manager on behalf of the Customer (your employer). See section 5 [‘Who has access to your data?’](#).

#### **4.3.6.b Compliance with laws and legal obligations and protection of Ayvens assets and interests**

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations;
- (b) to comply with legal process;
- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions and other applicable policies;
- (e) to protect our operations;
- (f) to protect our and/or our affiliates’, your or other’s rights, privacy, safety or property; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

If you and your employer have given consent, Ayvens can also analyse information about your vehicle(s) if you have already leased a vehicle via Ayvens, for example to determine the lease price of your new lease vehicle.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, your contact information, your correspondence with Ayvens, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph.

*With whom do we share your Personal Data?*

Only if we are required to do so by law or sectorial recommendation to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. In which case we may share this information with the authorized (International) Fleet Manager on behalf of the Customer (your employer See section 5 '[Who has access to your data?](#)').

#### 4.4 Data pertaining to private lease customer (including sole proprietors and partnerships)

##### 4.4.1 Sign up

##### 4.4.1.a To be able to accept you as a customer

*What does this purpose entail?*

We collect Personal Data when you sign up as a customer, via our website or otherwise. This processing is required for the conclusion and performance of the lease agreement, including assessment, identifying and acceptance of you as a customer and any credit checks.

*Which Personal Data do we process for this purpose?*

For this purpose, we collect your name, address, contact details (including your e-mail address and telephone number), driver's license details and delivery address or pick-up location. Additionally, where relevant, we may process your identification card or electronic identification for verification purposes.

*With whom do we share your Personal Data?*

We share your information with a third party with whom we have an agreement for making online payments, such as the deposit payment and the monthly payments of the lease amount. We share information that is necessary for the execution of the payments. See section 5 '[Who has access to your data?](#)'.

##### 4.4.1.b Portals and apps

*What does this purpose entail?*

We offer you online portals or apps through which you can find practical information on your lease vehicle, your contact information and other personal information, report changes thereto, report damage to your vehicle, record appointments for repairs, maintenance or tire change, and

contact our customer service.. This processing is required for the performance of the lease agreement or done with your consent.

*Which Personal Data do we process for this purpose?*

For this purpose, we collect your name and e-mail address to send you a temporary password, which you will need to use the platform and apps.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.4.2 Contact**

##### **4.4.2.a To communicate with you**

*What does this purpose entail?*

You can contact us by various means (such as via e-mail, telephone, our website). In this case we use your Personal Data to answer your question/request. We can also contact you in relation to the private lease contract. This processing is required for the performance of the lease agreement or with your consent.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your contact information, your correspondence with Ayvens pertaining to your question/request and all other Personal Data you provide to us and/or which is necessary to appropriately respond to you, (incl. the license plate number), the agreed term of the private lease contract and your financial obligations to us.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

##### **4.4.2.b For surveys or other (marketing) communication**

*What does this purpose entail?*

We process your Personal Data when we send you periodic surveys to request your feedback on our Services and other services performed on the vehicle, for which we have a legitimate interest to process these data. With your consent or where we have a legitimate interest we may send you marketing communication, to keep you updated on events, current and future offers, possibilities and current and future products and services of Ayvens. When we contact you in regard of surveys or marketing communication, we will do so either by e-mail or by postal mailings. To understand what is relevant to you, we can use manual and automatic tools to analyse your Personal Data. If you would no longer like to receive surveys or marketing communication from us, please use the opt out options in the communication, contact the local Ayvens entity via its webform for individual rights or use the contact details below.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, your address, your e-mail address, the license plate number and topics you may be interested in (as may be indicated by you on our website).

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.4.3 Vehicle services**

##### **4.4.3.a Management of the vehicle**

*What does this purpose entail?*

We process your information in relation to administering your use of the vehicle and to handle the day-to-day management of the vehicle. This processing is required for performance of the lease agreement.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, address, e-mail address, license plate number, service history and operational contact with you. In addition, you may provide certain information pertaining to vehicle management to us through the Ayvens portal, or when you call Ayvens or any partners.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

##### **4.4.3.b Repair, maintenance and tires**

*What does this purpose entail?*

We process your Personal Data in relation to providing repair and maintenance services and tires services for your vehicle and to analyse, predict and pro-actively steer on maintenance and repairs. For this processing we have a legitimate business interest and is required for performance of the lease agreement.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, address, e-mail address, license plate number, vehicle identification number, service history and operational contact with you. In addition, you may provide certain information to us through the Ayvens portal (e.g., your phone number to make an appointment for maintenance of the vehicle), or when you call Ayvens.

*With whom do we share your Personal Data?*

We share information with third parties performing maintenance/repair on the vehicle or changing or replacing tires, such as dealers/garages, body repair shops or car fitters. See section 5 '[Who has access to your data?](#)'.

#### **4.4.3.c Accident management**

*What does this purpose entail?*

We process your Personal Data by recording and administering accidents that your vehicle may have been involved in. We will do so by giving you an opportunity to report accidents via our customer services department or via MyAyvens, and, when applicable, providing roadside assistance and/or a replacement vehicle. This processing is required for the performance of the lease agreement. We may also use this Information for assessing damage repairs under our damage handling and risk retention policies, for which we have a legitimate interest to process these data.

*Which Personal Data do we process for this purpose?*

For this purpose, we process the following Personal Data:

- Us: license plate number, make and model, service history and operational contact with you.
- From you: your name, contact details, vehicle details, accident details, damage details, photos of the incident, date of birth, number of passengers in the vehicle, information of witnesses to the accident (if applicable) and any other information you choose to provide to us in the context of the accident (including any information pertaining to possible injuries).
- From third parties, such as individuals involved in the accident or insurance companies: information of third parties involved in the accident/incident (such as the identity of your passengers, driver and passengers of third-party vehicles, and other third parties involved), information of other third parties (such as witnesses, investigating police officers and others) insurance information, information about the incident and third-party claims.
- From authorities (such as police): your name, address, license plate number, information regarding the accident, police reports and witness statements.

*With whom do we share your Personal Data?*

We may share certain information with dealers/garages, body repair shops, car fitters, insurance companies (which may be both affiliated and third-party insurance companies) and professional experts (such as lawyers, medical experts, investigators, etc.) for the purpose of damage or claim resolution. See section 5 '[Who has access to your data?](#)'.

#### **4.4.3.d Fuel card, EV charging card**

*What does this purpose entail?*

Where applicable, our Services include a fuel management program, which allows you to, for example, pay for your fuel at gas stations using an Ayvens issued or managed payment mechanism. In case you have an EV, you may be provided with an EV charging card for charging your vehicle at charge points. We may also arrange for the placement of an EV charge station as part of the contract. This processing is required for the performance of the agreement.

*Which Personal Data do we process for this purpose?*

For this purpose, we process the following information: your name, e-mail address, fuel or EV charging card number, charging station number, address, phone number and license plate number. In case of re-imburements, we may also need to collect bank account information.

*With whom do we share your Personal Data?*

Ayvens needs to share the information with the fuel card/EV-charging solution/payment company. See section 5 [‘Who has access to your data?’](#).

#### **4.4.3.e Traffic and parking fines management**

*What does this purpose entail?*

The following may depend on the country where you may have committed traffic and/or parking violations. As the registered owner of the vehicles, traffic and/or parking fines incurred by drivers of the vehicles may be addressed to Ayvens by the authority that issued a specific traffic or parking fine (such as police or local municipality).

We process your Personal Data for the purpose of processing and managing the payment of the fine. This processing is required for the performance of the lease agreement.

*Which Personal Data do we process for this purpose?*

We process information that we receive from the competent authorities (such as police or local municipalities): your name, address and license plate number, the nature, place, date and time of the offense/incident committed by you and the imposed fines.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.4.4 Mobility services**

##### **4.4.4a Roadside assistance**

*What does this purpose entail?*

When you experience a malfunction, for example, a flat tire or mechanical difficulties while on the road which makes it inappropriate or impossible to proceed, depending on the contract we have with you, Ayvens is able to arrange roadside assistance, for which we work closely with contracted third parties. This processing is required for the performance of the lease agreement.

*Which Personal Data do we process for this purpose?*

For this purpose, we process the following information: your name, e-mail, mobile phone number, license plate number and location of where assistance was needed and provided.

*With whom do we share your Personal Data?*



We share your information with third parties providing on the road repair services, towing services or a replacement vehicle. See section 5 [‘Who has access to your data?’](#).

#### **4.4.5 Ayvens business purposes**

##### **4.4.5.a Management reporting**

*What does this purpose entail?*

We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our websites and Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your e-mail address, place of residence, digits of your zip code and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

##### **4.4.5.b Compliance with laws and legal obligations and protection of Ayvens assets and interests**

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g., counterparty due diligence (CDD), money laundering, financing of terrorism and other crimes);
- (b) part of a credit check process;
- (c) to comply with legal process;
- (d) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (e) to enforce our terms and conditions and other applicable policies;
- (f) to protect our operations;

- (g) to protect our and/or our affiliates', your or other's rights, privacy, safety or property; and
- (h) to allow us to pursue available remedies or limit the damages that we may sustain.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, contact information, the date, place and country of birth, in case of a company of the ultimate beneficial owner of the company; we may also process the name, address and the date, place and country of birth of the person(s) who represent the company towards Ayvens; your correspondence with Ayvens, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For know your customer (KYC purposes we periodically also process investigation data based on EU sanctions, adverse media and politically exposed persons. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note, multiple for the task trained employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

*With whom do we share your Personal Data?*

If we are required to do so by law or sectorial recommendation to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See section 5 '[Who has access to your data?](#)'.

## 4.5 Data pertaining to private buyers of used vehicles

### 4.5.1 Purchase

#### 4.5.1.a Purchase of a Ayvens used vehicle

*What does this purpose entail?*

We process your Personal Data in relation to your (potential) purchase of a Ayvens used vehicle, if applicable, the trade in of your vehicle and other related Services. This includes the execution of the purchase agreement, the delivery of Services and the settlement of the payment transaction. This processing is required for the conclusion and performance of the agreement, including assessment, acceptance of you as a customer and preliminary credit checks.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, title, contact details (including your e-mail address, telephone number, name of your company), information related to your trade in vehicle and details needed to complete the transaction, including bank account information.

*With whom do we share your Personal Data?*

We may share this information with trade in parties or financial services partners. See section 5 '[Who has access to your data?](#)'.

## **4.5.2 Buyer contact**

### **4.5.2.a To communicate with you**

*What does this purpose entail?*

We process your Personal Data when you contact us via one of our online contact forms (or provide information in one of our used vehicle centres), for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services. We can contact you relating to a (potential) purchase of a vehicle. This processing is required for the performance of the agreement that you have with us or with your consent.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, title, (business) contact details (including your e-mail address, telephone number, name of your company) and any other information that you provide to us in the open field entry of the contact form, where you can, for example, pose your question, describe your suggestion, make a compliment or share a complaint.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

### **4.5.2.b For surveys or other (marketing) communication**

*What does this purpose entail?*

We process your personal information when we send you a survey to request your feedback on our Services, for which we have a legitimate interest to process these data. With your consent or where we have a legitimate interest, we may send you marketing communication, to keep you updated on events, current and future offers, possibilities and current and future products and services of Ayvens. When we contact you in regard of surveys or marketing communication, we will do so either by e-mail or by postal newsletters/brochures/magazines (postal mailings). To understand what is relevant to you, we can use manual and automatic tools to analyse your Personal Data. If you would no longer like to receive surveys or marketing communication from us, please use the opt out options in the communication, contact the local Ayvens entity via its webform for individual rights or use the contact details below.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, your address, your e-mail address, and your interests (as indicated by you).

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

## **4.5.3 Ayvens business purposes**

#### **4.5.3.a Management reporting**

*What does this purpose entail?*

We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our websites and Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your e-mail address, place of residence, digits of your zip code and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.5.3.b Compliance with laws and legal obligations and protection of Ayvens assets and interests**

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g., know your customer/KYC, money laundering, financing of terrorism and other crimes);
- (b) to comply with legal process;
- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions and other applicable policies;
- (e) to protect our operations;
- (f) to protect our and/or our affiliates’, your or other’s rights, privacy, safety or property; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, contact information, the date, place and country of birth, in case of a company of the ultimate beneficial owner of the company; we may also process

the name, address and the date, place and country of birth of the person(s) who represent the company towards Ayvens; your correspondence with Ayvens, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For know your customer (KYC) purposes we periodically also process investigation data based on EU sanctions, adverse media and politically exposed persons. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note, multiple for the task trained employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

*With whom do we share your Personal Data?*

Only if we are required to do so by law or sectorial recommendation to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See section 5 '[Who has access to your data?](#)'.

## 4.6 Data pertaining to professional buyers of used vehicles (traders)

### 4.6.1 Registration and purchase

#### 4.6.1.a Registration as a professional trader

*What does this purpose entail?*

To be able to purchase Ayvens Used vehicle on an auction or purchase a vehicle via our car remarketing website(s), traders need to be registered with Ayvens as a professional trader. This processing is based on our legitimate interest (and also relates to the providing of Services under the performance of an agreement, including assessment, acceptance or credit checks) or based on a legal obligation.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, contact details (including your e-mail address, telephone number), your identification card and information related to your company including Chamber of Commerce document and VAT certificate.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### 4.6.1.b Purchase of Ayvens used vehicles

*What does this purpose entail?*

We process your Personal Data in relation to your (potential) purchase of an Ayvens used vehicle and/or other related Services via an auction or via our car remarketing website(s), this includes the execution of the purchase agreement, the delivery and the settlement of the payment transaction. This processing is based on our legitimate interest (and also relates to the providing of Services under the conclusion and performance of the purchase agreement).

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, contact details (including your e-mail address, telephone number), your identification card and information related to your company including Chamber of Commerce document and VAT certificate, details needed to complete the transaction, including bank account information.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.6.2 Trader contact**

##### **4.6.2.a To communicate with you**

*What does this purpose entail?*

We process your Personal Data when you contact us via one of our online contact forms (or provide information in one of our used vehicle centres), for example, when you send us questions, suggestions, compliments or complaints, or when you request a quote for our Services. We can contact you relating to a (potential) purchase of a vehicle. This processing is based on our legitimate interest (and also relates to the providing of Services under the performance of the agreement that we have with the Trader) or with your consent.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your business contact details, your correspondence with Ayvens pertaining to your question/request and all other Personal Data you provide to us and/or which is necessary to appropriately respond to you.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

##### **4.6.2.b For surveys or other (marketing) communication**

*What does this purpose entail?*

We process your Personal Data when we send you a survey to request your feedback on our Services for which we have a legitimate interest to process these data. With your consent or where we have a legitimate interest, we may send you marketing communication, to keep you updated on events, current and future offers, possibilities and current and future products and services of Ayvens. When we contact you in regard of surveys or marketing communication, we will do so either by e-mail or by postal newsletters/ brochures/magazines (postal mailings). If you would no longer like to receive surveys or marketing communication from us, please use the opt out options in the communication, contact the local Ayvens entity via its webform for individual rights or use the contact details below.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, your address, your e-mail address, and your interests (as indicated by you).

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.6.3 Ayvens business purposes**

##### **4.6.3.a Management reporting**

*What does this purpose entail?*

We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our websites and Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your e-mail address, place of residence, digits of your zip code and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

##### **4.6.3.b Compliance with laws and legal obligations and protection of Ayvens assets and interests**

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary

- (a) under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g., counterparty due diligence (CDD), money laundering, financing of terrorism and other crimes);
- (b) to comply with legal process;

- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions and other applicable policies;
- (e) to protect our operations;
- (f) to protect our and/or our affiliates', your or other's rights, privacy, safety or property; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

*Which Personal Data do we process for this purpose?*

For this purpose, we process your name, contact information, the date, place and country of birth, in case of a company of the ultimate beneficial owner of the company; we may also process the name, address and the date, place and country of birth of the person(s) who represent the company towards Ayvens; your correspondence with Ayvens, your use of Services and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For know your customer (KYC) purposes we periodically also process investigation data based on EU sanctions, adverse media and politically exposed persons. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note, multiple for the task trained employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

*With whom do we share your Personal Data?*

If we are required to do so by law or sectorial recommendation to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See section 5 '[Who has access to your data?](#)'.

## 4.7 Data pertaining to suppliers

### 4.7.1 Supplier account management

#### 4.7.1.a To provide, manage and administer the Supplier account

*What does this purpose entail?*

We process your Personal Data to handle day-to-day management and administration of the Supplier accounts, such as maintaining contracts, and keep you informed of all important developments concerning the services you render and other information which is relevant for the Supplier contract and account. This processing is based on the agreement that we have with you or based on a legal obligation.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process business contact details and log-in details to our Supplier online accounts.



*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.7.1.b To communicate with you**

*What does this purpose entail?*

You can contact us by various means (such as e-mail or telephone, or via our website). In this case we use your Personal Data to answer your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Supplier account. This processing is based on the agreement that we have with you or with your consent.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your contact details, your correspondence with Ayvens pertaining to your question/request and all other personal information you provide to us and/or which is necessary to appropriately respond to you.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.7.1.c For surveys or other (marketing) communication**

*What does this purpose entail?*

We process your Personal Data to send you surveys, for which we have a legitimate interest to process these data. With your consent or where we have a legitimate interest, we may send you marketing communication, for example, to keep you updated on events, current and future offers, possibilities and current and future products and services of Ayvens. We send you such surveys in the form of either a periodic e-mail or an e-mail to request your feedback on our communication and relationship. We may also send you postal mailings (newsletters/brochures/magazines). If you would no longer like to receive surveys or marketing communication from us, please use the opt out options in the communication, contact the local Ayvens entity via its webform for individual rights or use the contact details below.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name and your contact details.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.7.2 Ayvens premises**

##### **4.7.2.a Access to and security control of Ayvens premises**

*What does this purpose entail?*

We may process your Personal Data when you visit us on our premises for the purpose of ensuring appropriate access controls and security, for which we have a legitimate interest (safety and security of our assets).

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your contact information and the person you are visiting. We may also process video and/or audio information about you through video/audio recording equipment, such as for instance CCTV.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

#### **4.7.3 Ayvens business purposes**

##### **4.7.4.a Management reporting**

*What does this purpose entail?*

We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our websites and Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your e-mail address, place of residence, digits of your zip code and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

##### **4.7.4.b Compliance with laws and legal obligations and protection of Ayvens assets and interests.**

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) Under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g., know your supplier (KYS), money laundering, financing of terrorism and other crimes);
- (b) to comply with legal process;
- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions and other applicable policies;
- (e) to protect our operations;
- (f) to protect our and/or our affiliates', your or other's rights, privacy, safety or property; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

*Which Personal Data do we process for this purpose?*

For this purpose, we process the name, contact information, the date, place and country of birth of the ultimate beneficial owner of the counterparty that Ayvens wants to do business with; we also process the name, address, job title, signature and the date, place and country of birth of the person(s) who represent the counterparty towards Ayvens; your correspondence with Ayvens, the services you render and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For know your supplier (KYS) purposes we periodically also process investigation data based on EU sanctions, adverse media and politically exposed persons. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note, multiple for the task trained employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

*With whom do we share your Personal Data?*

Only if we are required to do so by law or sectorial recommendation to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See section 5 '[Who has access to your data?](#)'.

## 4.8 Data pertaining to business partners

### 4.8.1 Business partner account management

#### 4.8.1.a To provide, manage and administer the Business Partner account

*What does this purpose entail?*

We process your Personal Data to handle day-to-day management and administration of the Business Partner accounts, such as maintaining contracts, and keep you informed of all important developments concerning the arrangements between us, other information which is

relevant for the Business Partner contract and account. This processing is based on the agreement that we have with you or based on a legal obligation.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your business contact details.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.8.1.b To communicate with you**

*What does this purpose entail?*

You can contact us by various means (such as e-mail or telephone). In this case we use your Personal Data to answer your question/request. We can also contact you, for example, regarding day-to-day management and administration of your Business Partner account. This processing is based on the agreement that we have with you or with your consent.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your business contact details, your correspondence with Ayvens pertaining to your question/request and all other data you provide to us and/or which is necessary to appropriately respond to you.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

#### **4.8.1.c For surveys or other (marketing) communication**

*What does this purpose entail?*

We process your Personal Data to send you surveys, for which we have a legitimate interest to process these data. With your consent or where we have a legitimate interest, we may send you marketing communication, for example, to keep you updated on events, current and future offers, possibilities and current and future products and services of Ayvens. We send you such surveys in the form of either a periodic e-mail or an e-mail to request your feedback on our communication and relationship. We may also send you postal mailings (newsletters/brochures/magazines). If you would no longer like to receive surveys or marketing communication from us, please use the opt out options in the communication, contact the local Ayvens entity via its webform for individual rights or use the contact details below.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name and your business contact details.

*With whom do we share your Personal Data?*

See section 5 [‘Who has access to your data?’](#).

## **4.8.2 Ayvens premises**

### **4.8.2.a Access to and security control of Ayvens premises**

*What does this purpose entail?*

We may process your Personal Data when you visit us on our premises for the purpose of ensuring appropriate access controls and security, for which we have a legitimate interest (safety and security of our assets).

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your name, your contact information and the person you are visiting. We may also process video and/or audio information about you through video/audio recording equipment, such as for instance CCTV.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

## **4.8.3 Ayvens business purposes**

### **4.8.4.a Management reporting**

*What does this purpose entail?*

We process Personal Data for various Ayvens business-related purposes for which we have a legitimate interest to process these data, such as data analysis, audits, developing new products, enhancing, improving or modifying our websites and Services, identifying usage trends, determining the effectiveness of our promotional campaigns and operating and expanding our business activities.

To facilitate your use of our online services or applications, we may analyse data that we collect when using our digital media and combine it with information collected via cookies. For example, to better understand which digital channel (Google search, e-mail, social media) or device (desktop, tablet or mobile) you prefer, we can optimize or limit our communication and marketing activities by channel and by device.

*Which Personal Data do we process for this purpose?*

For this purpose, we may process your business contact details and any other information mentioned in this Statement or otherwise provided to us by you, if such is required for one of the purposes mentioned in the previous paragraph.

*With whom do we share your Personal Data?*

See section 5 '[Who has access to your data?](#)'.

**4.8.4.b Compliance with laws and legal obligations and protection of Ayvens assets and interests.**

*What does this purpose entail?*

To comply with a legal obligation or where we have a legitimate interest, we process your Personal Data as appropriate or necessary:

- (a) Under applicable law, including laws outside your country of residence and including sectorial recommendations (e.g., know your partner/KYP, money laundering, financing of terrorism and other crimes);
- (b) to comply with legal process;
- (c) to respond to requests from public and government authorities including public and government authorities outside your country of residence;
- (d) to enforce our terms and conditions and other applicable policies;
- (e) to protect our operations;
- (f) to protect our and/or our affiliates', your or other's rights, privacy, safety or property; and
- (g) to allow us to pursue available remedies or limit the damages that we may sustain.

*Which Personal Data do we process for this purpose?*

For this purpose, we process the name, contact information, the date, place and country of birth of the ultimate beneficial owner of the counterparty that Ayvens wants to do business with; we also process the name, address, job title, signature and the date, place and country of birth of the person(s) who represent the counterparty towards Ayvens; your correspondence with Ayvens, the services you render and any other information mentioned in this Statement, if such is required for one of the purposes mentioned in the previous paragraph. For know your partner (KYP purposes we periodically also process investigation data based on EU sanctions, adverse media and politically exposed persons. For this purpose, a risk-based approach is used to ensure only necessary Personal Data is collected. Please note, multiple for the task trained employees are involved to evaluate the screening results in case of a 'hit' (human intervention).

*With whom do we share your Personal Data?*

Only if we are required to do so by law or sectorial recommendation to which Ayvens is subject, your Personal Data will be provided to supervisory agencies, fiscal authorities and investigative agencies. See section 5 '[Who has access to your data?](#)'.

## 5. Who has access to your data?

We may share your personal data with others to the extent that we have a legal obligation to do so, to perform services and enter into and fulfil contracts we have with you or your employer, or with your consent. In addition to what is stated in relation to each purpose above regarding who has access to the personal data, we may also, if necessary, share personal data as follows.

- Internally within the company to those departments that need to access the data for sales, customer service, purchasing, contract management, marketing, IT, recruitment, support and maintenance. We may share your data with other companies within the Ayvens group, who may need to process it in accordance with this Information.
- Within Société Générale Group to which Ayvens belongs, for internal administrative purposes, to fulfil a legal obligation, to improve our services, to enable us to comply more efficiently and more effectively with laws and regulations or for monitoring, control and reporting purposes. Reporting purposes relate to any regulatory and statutory reporting obligations and data requests as required by Société Générale Group's regulators.
- To our vehicle-related suppliers such as car suppliers, tyre suppliers, fuel suppliers and other service providers, such as data providers and data administrators, who are instructed to use your personal data only in accordance with our requirements.

In order to provide you with our services, we often work closely with service partners, service providers and unaffiliated partners. Our independent service partners assist us in providing our leasing and other services to you, and include dealerships, maintenance providers, body repair shops, and roadside assistance providers and rental service companies. Dealerships or vehicle suppliers may require contact details of a driver to activate a personal account necessary to be set up as a driver.

Service providers are companies we retain that support us in running our business, for example to help us maintain our IT network and related infrastructure and security and access controls to our premises.

- With external business partners such as credit reference agencies, insurance companies and marketing partners.

We also use and disclose your Personal Data when we have a legal obligation or legitimate interest to do so:

- To comply with applicable law and regulations.
- To cooperate with public and government authorities. To respond to a request or to provide information we believe is important.

- To cooperate with law enforcement. For example, when we respond to law enforcement requests and orders or provide information, we believe is important.
- For other legal reasons such as to enforce our terms and conditions and to protect our rights, privacy, safety or property, and/or that of our affiliates, you or others.
- In connection with a sale or business transaction.  
We have a legitimate interest in disclosing or transferring your Personal Data to a third party in the event of any reorganization, merger, sale, joint venture, assignment, transfer or other disposition of all or any portion of Ayvens business, assets or stock (including in connection with any bankruptcy or similar proceedings). Such third parties may include, for example, an acquiring entity and its advisors.

We will limit access to Personal Data to personnel with a business need to know for the purposes described in this Statement.

## **6. What personal data may be transferred to third countries?**

Your personal data may be stored and/or processed in a country other than Sweden. Some countries outside the EEA are considered to provide an adequate level of protection for your personal data according to EU standards. For transfers of personal data to other countries, Ayvens has put in place adequate measures to protect your personal data, such as standard contractual clauses. You can obtain a copy of these measures by contacting us using the address in the section 12. 'How can you contact us?' below.

## **7. Children's privacy**

Our Services are not directed at individuals under the age of 18.

## **8. Do we use your data for other purposes?**

We may also use your Personal Data for a purpose other than the initial purpose. This is subject to the condition that the secondary purpose is in line with the initial purpose. The following factors are inter alia taken into account: are the purposes clearly related; is the secondary purpose appropriate and/or expected, was the Personal Data obtained directly from you or in another way; what kind of Personal Data



is concerned for the secondary purpose; what would be the implications for you; and what data protection measures are applied when using your data for the secondary purposes.

## 9. How long will we keep your data?

Ayvens will retain your personal data for as long as necessary or required to fulfil the purpose(s) and object(s) of the processing as set out in this Notice and to comply with applicable law. We therefore process and store your personal data for different periods of time depending on where the data occurs, what type of personal data it is and what is necessary to fulfil a contract with you or your company, taking into account legal requirements and recommendations from the Privacy Protection Authority, IMY.

At the end of the retention period, the personal data will be deleted or anonymised.

## 10. How do we secure your data?

We seek to use appropriate organizational, technical and administrative measures to protect Personal Data within our organization, in accordance with applicable privacy and data protection laws and regulations. Unfortunately, no data transmission or storage system can be guaranteed to be 100% secure. If you have reason to believe that your interaction with us is no longer secure, please notify us in accordance with section 12. *'How can you contact us?'* below immediately.

## 11. Changes to this statement

This Statement may be amended from time to time as a result of changes in the processing of your personal data. However, these changes will always be made in accordance with applicable law. Please check this page from time to time for the latest information on how we protect your personal data.

The date of the last update can be found at the top of this Statement.

## 12. How can you contact us?

If you have any questions, enquiries or complaints, please contact us using the contact details below. As email communication is not always secure, please do not include sensitive personal information in the emails you send to us.

**Address:** Ayvens Sweden AB, Råsundavägen 4, 169 67 Solna

**E-mail address:** [privacy.se@ayvens.com](mailto:privacy.se@ayvens.com)

**Contact form:** <https://privacyportal-eu.onetrust.com/webform/396c853c-7bbe-43bb-9c80-0001fd327955/be28d3f9-901b-4129-8406-23e6d9b2e15c>

### 13. How can I exercise my personal data rights?

Under the GDPR, as a data subject, you have specific statutory rights that you are entitled to exercise against the data controller.

Please contact us by any of the means set out in section 12. ‘How can you contact us?’ if you have any questions or concerns about how Ayvens processes your personal data, if you wish to exercise your rights of access, rectification, erasure, restriction of processing, data portability or to object to processing, or if you wish to withdraw your consent. We will respond to your request in accordance with applicable law.

Please note that we may not be required to comply (or fully comply) with your request. Applicable laws or regulations may impose conditions or restrict certain of such rights. For instance, for as long as we have a relationship with you, or where personal data is kept in a backup system (for the purpose of restoring the data in case of a data loss event) and the data purging cycle may be different than applicable to the production system. In those circumstances, we will write to you explaining why we are unable to comply at that moment or, in the case of backup data, the request may be implemented at a later stage (when the backup is overwritten).

In your request, please make clear what Personal Data you would like to access or have changed or deleted, or otherwise let us know what limitations you would like to put on our use of your Personal Data.

For your protection, in principle we only implement requests with respect to the information associated with the e-mail address that you use to send us your request, and we may request additional information necessary to verify your identity before implementing your request. Please note that certain Personal Data may be exempt from such requests pursuant to applicable data protection laws or other laws and regulations.

Please note that you have the right to lodge a complaint at any time regarding Ayvens’ processing of personal data with the Swedish Authority for the Protection of Privacy (IMY). You can find the contact details of IMY on its website.